

Zachary C. Oren, Esq.
Attorney at Law
401 Rutger Street
Utica, NY 13501

March 10, 2021

Honorable Andrew T. Baxter
U.S. Magistrate Judge
P.O. Box 7396
Syracuse, NY 13261-7396

Re: Puleo v. Masonic Medical Research Institute, et al.
Civil Act. No.: 6:20-cv-1593 (TJM/ATB)

Dear Judge Baxter:

Presently the FRCP 16 Civil Case Management Plan and FRCP 26 initial disclosures are due this coming Monday, March 15, 2021 for the above captioned matter. Additionally, the FRCP 16 conference is scheduled for March 22, 2021. Counsel for Defendants has not appeared, nor has Defendants' time to answer expired. Therefore, it is respectfully requested that these deadlines be adjourned so defense counsel can appear and respond to the Complaint.

Finally, please be advised I have a jury trial starting on April 26, 2021 in Brown v. Utica Police Department, et al., US-NDNY 6:17-cv-01190 (BKS/ATB) and another jury trial starting on May 11, 2021 Hensel v. City of Utica, US-NDNY 6:15-cv-374 (LEK/TWD). Accordingly, I will be unavailable for the FRCP 16 conference during those weeks.

I thank the Court for its understanding and patience with this matter.

Respectively,

/s/ Zachary C. Oren

Zachary C. Oren, Esq.